

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:19-cv-00427-BO**

**NOKIA TECHNOLOGIES OY,**

**Plaintiff,**

**v.**

**LENOVO (SHANGHAI)  
ELECTRONICS TECHNOLOGY CO.  
LTD.; LENOVO GROUP, LTD.;  
LENOVO BEIJING, LTD.; LENOVO PC  
HK LIMITED; LENOVO (UNITED  
STATES), INC.**

**Defendants.**

**CONSENT MOTION FOR  
EXTENSION OF TIME TO RESPOND  
TO MOTION TO LIFT STAY**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and with the consent of Plaintiff's counsel, Defendant Lenovo (United States), Inc. ("Lenovo US") moves the Court for an extension up to and including **March 24, 2021**, in which to respond to Plaintiff Nokia Technologies Oy's Motion to Lift Stay for the Limited Purpose of Requesting an Injunction Against a Second Filed Case Raising the Same Issues Present Here (ECF No. 119) ("Nokia's Motion to Lift Stay"). In support of this Motion, Lenovo US shows the Court the following:

1. On September 25, 2019, Plaintiff filed this Lawsuit;
2. On September 18, 2020, this Court entered an Order staying all proceedings (ECF No. 118);
3. On February 17, 2021, Nokia moved to the lift the stay (ECF No. 119);
4. Under Local Civil Rule 7.3(f)(1), Lenovo US's response to Nokia's Motion to Lift Stay is currently due March 10, 2020;
5. Lenovo US needs additional time to evaluate Nokia's Motion to Lift Stay and to

continue conversations with Nokia in an attempt to forego the need for Nokia's Motion altogether;

6. Counsel for Lenovo US has contacted counsel for Plaintiff, who has consented to this Motion; and

7. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Lenovo US requests that this Court grant its motion and allow Lenovo US until March 24, 2021 to respond to Plaintiff's Complaint.

Respectfully submitted, this the 9th day of March, 2021.

**WOMBLE BOND DICKINSON (US) LLP**

/s/ Jacob S. Wharton

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